Permit

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

December 12, 2002

Mr. James Sales
US Environmental Protection Agency
Region 6, 6PD-O
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

SUBJECT: REVIEW OF THE DRAFT POLYCHLORINATED BIPHENYL LAND DISPOSAL PERMIT FOR LOS ALAMOS NATIONAL LABORATORY RCRA IDENTIFICATION NM0890010515

Dear Mr. Sales:

The New Mexico Environment Department has completed the review of the Environmental Protection Agency's September 2002 (EPA) Draft Toxic Substance Control Act Permit for polychlorinated biphenyl (PCB) disposal at Los Alamos National Laboratory (LANL Facility). We appreciate EPAs efforts to incorporate NMEDs comments on the previous draft. Our comments on this latest version follow.

General comments:

1) Annually and upon complete investigation of TA-54 Area G/Material Disposal Area (MDA) G by the LANL Facility, EPA should reconsider the PCB permit requirements and waivers as data from the investigations may indicate site conditions were not fully understood/characterized at the time of the issuance of EPAs PCB permit.

2) EPA should consider the possibility of shallower perched groundwater at TA-54 Area G. Subsurface investigations at TA-54 MDA L, located roughly 1 mile to the west of Area G, core

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hole 54-1015 encountered "moist" conditions at 190-228 feet and "wet" conditions at 488 feet; core hole 54-1010 encountered "moist" conditions at 37.5 feet, roots observed in fractures at 51.5 feet; core hole logs for 54-1016 noted "increased" moisture at 149 feet, "moist" soil at 320 feet, "moist" conditions at 325 to 350 feet, and "blew water through cyclone" at 592 feet.

Additional subsurface characterization at Area G, as required by NMED, will include PCBs analyses and will validate the site conceptual model regarding subsurface migration and perched groundwater. EPA should therefore reconsider the permit requirements and waivers annually until the investigations are complete.

Because of the inadequate investigation at Area G, NMED has not yet determined if liners, leachate collection system(s), etc. in the shafts and pits are needed.

Section III. Disposal Unit Design, Construction and Operation.

A.General Design and Construction Requirements.3
3)The requirement that "No PCB liquids or Items containing PCB liquids may be placed in a disposal pit or shaft." The requirement should read "No PCB liquids, items containing PCB liquids or other liquids may be placed in a disposal pit or shaft."

C. PCB Pit Operating Requirements.3
4) The requirement that "No PCB liquids or Items containing PCB liquids may be placed in a disposal pit." The requirement should read "No PCB liquids, items containing PCB liquids or other liquids may be placed in a disposal pit."

D. PCB Shaft Operating Requirements.3
5) The requirement that "No PCB liquids or Items containing PCB liquids may be placed in a disposal shaft." The requirement should read "No PCB liquids, items containing PCB liquids or other liquids may be placed in a disposal shaft."

E. Surface and Ground Water Monitoring Requirements.4
6) The requirement that the LANL Facility "Once annually, samples must be collected from Monitoring Well #R-22 at the five sampling ports at 906 feet, 962 feet, 1273 feet, 1379 feet, and 1449 feet." This requirement may be inadequate based on investigations to be completed by the LANL Facility at TA-54 and EPA may want to either broaden the scope to allow for additional groundwater monitoring or to revisit this requirement annually, until complete investigation of Area G, as more information regarding the site conceptual model is known. For example, the LANL Facility is in the process of completing 4 additional deep regional wells (R-20, R-21, R-23, R-32) in close proximity to TA-54, Area G that EPA may want to consider additional groundwater monitoring requirements. R-32, located south of Area G in Pajarito Canyon,

encountered an alluvial groundwater system at 18 feet and numerous perched groundwater-bearing zones (beginning at 277 feet).

E. Surface and Ground Water Monitoring Requirements.6
7) The LANL Facility must comply with *the surface and* ground water monitoring requirements for Area G in its effective RCRA permit *and any RCRA cleanup or corrective action order* issued by the New Mexico Environment Department (NMED). *To avoid duplicative requirements, the surface and ground water monitoring activities conducted to fulfill the requirements of such permit or order issued by NMED may also serve to fulfill any equivalent requirements of this approval.*

Section V. Closure Plans and Post Closure Care.1

8) The LANL Facility must comply with closure and post-closure care requirements for the PCB shafts and pits in its effective RCRA permit *and with the cleanup requirements for the PCB shafts and pits in any RCRA cleanup or corrective action order* issued by the NMED.

Should you have any questions please do not hesitate to contact John Young at (505) 428-2538.

Sincerely,

James P. Bearzi
Chief
Hazardous Waste Bureau

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File: Reading and LANL Permit